

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

TODD PHILLIPS, et al.	:	CIVIL ACTION NO:
	:	5:17-cv-01524
VERSUS	:	
	:	
JULIAN WHITTINGTON,	:	DISTRICT JUDGE JAMES
individually and in his	:	
official capacity as	:	
SHERIFF OF BOSSIER PARISH,	:	
et al.	:	MAGISTRATE JUDGE HORNSBY

- C O N F I D E N T I A L -

VIDEO DEPOSITION OF SHERIFF JULIAN WHITTINGTON
July 25, 2019

Reported by:
Karen Tyler, CCR(LA), CSR(TX), TCRR, CRR, CRC
Registered Diplomat Reporter
Notary Public

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

23

1 Q. Okay. And then you said you served as Chief
2 of Corrections?

3 A. Correct.

4 Q. Okay. How long did you serve as Chief of
5 Corrections?

6 A. About a year and a half.

7 Q. And what were your duties as Chief of
8 Corrections?

9 A. Ensure that corrections was being operated
10 properly, that they had what they needed to do their
11 job. Overseeing the supervisors.

12 Q. And was this -- were you in charge of the --
13 I guess it's the maximum, medium?

14 A. Right. All of our prisons are under the
15 corrections.

16 Q. Did you have to go -- undergo -- or did you
17 undergo any additional training for corrections?

18 A. No.

19 Q. And you said you were elected Sheriff
20 in 2011?

21 A. Correct.

22 Q. When did you take office?

23 A. July 1 of '12.

24 Q. Did you undergo any additional training once
25 you were elected Sheriff?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

27

1 MR. LANGLEY: Thank you.

2 Q. (By Ms. Buckle) Sheriff, I was going to ask
3 you about the chain of command when you were elected
4 but before taking office.

5 (Mr. Hays exits the room.)

6 A. Okay.

7 Q. (By Ms. Buckle) And am I correct in that
8 detectives would report, I believe it was to Captain
9 Joey Cleveland and then Chief Tom Myrick and then
10 Deputy Chief Don Rittenberry to Sheriff Larry Deen.
11 Was that the correct chain of command?

12 A. I actually resigned in order to run, and so I
13 was not there in all the months leading up to my
14 taking office. I came back to the sheriff's office
15 probably a couple of months before the July 1st
16 swearing in. Those names sound familiar, but I
17 couldn't tell you with absolute certainty that
18 that's -- I don't think you mentioned, I think -- I'm
19 not sure what his title was. Doyle Dempsey was in the
20 mix there during this. So, I guess, if you add his
21 name to it, those would be the same players, yes.

22 Q. Okay. And would it be correct that once you
23 took office you assigned new people to fill the roles
24 of Captain in the detectives division, as well as
25 Chief of criminal division and Deputy Chief? would

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

28

1 that be correct?

2 A. That's correct. We eliminated Deputy Chief
3 and made some changes, yes.

4 Q. Okay. And you selected Deputy Chief Charlie
5 Owens, Chief Tony Staton and Captain Sean Phillips; is
6 that correct?

7 A. And selected -- well, obviously the Chief
8 Deputy was Chief Owens, and Tony Staton and Captain
9 Phillips, yes.

10 Q. Was there anyone else that was in the chain
11 of command for the criminal investigation in the
12 detectives division?

13 A. I'm sure we had some lieutenants and other --
14 other people beyond ones you just listed. I don't
15 know.

16 Q. Other than just the detectives, though, as
17 far as who they reported or how information was passed
18 to you, was there anyone else involved in that chain
19 of command, or has there been anyone else involved in
20 that chain of command?

21 A. Those were the key players.

22 Q. Okay.

23 A. Yeah.

24 Q. Why did you select Charlie Owens?

25 A. He was the right man for the job.

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

37

1 A. Yes.

2 Q. Okay.

3 A. And even --

4 Q. Before?

5 A. -- before.

6 Q. Sheriff, I also advised your counsel that I
7 was going to ask you about policies, procedures,
8 practices, and customs of the Bossier Parish Sheriff's
9 Office concerning Brady material, specifically any
10 changes implemented by you after July 1st, 2012.

11 And your counsel replied in the July 24th,
12 2019, correspondence --

13 MR. LANGLEY: You have a copy before you.
14 It's number 8 -- excuse me. It's number 5 on the
15 second page of this responding to --

16 MS. BUCKLE: Number 6.

17 MR. LANGLEY: Excuse me. Number 6.

18 A. Policy and procedure, Brady. Okay.
19 Number 6.

20 Q. (By Ms. Buckle) And your counsel responded
21 on your behalf: The Sheriff has no personal knowledge
22 or personal involvement regarding the policies,
23 procedures, practices, and customs of the Bossier
24 Parish Sheriff's Office concerning Brady material or
25 of any changes implemented by him after

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

38

1 July 1st, 2012.

2 Is that a correct statement?

3 A. Yes. We go by the law.

4 Q. Okay. What is your understanding as to what
5 is required by the law for disclosure of Brady
6 material?

7 A. Well, exculpatory evidence, things are
8 developed, the DA is required to inform the defendant
9 of new information basically.

10 Q. Okay. You indicated that the DA is to
11 provide the defendant with information. Do you know
12 if the Bossier Parish Sheriff's Office has a policy
13 concerning whether deputies employed by the Sheriff's
14 Office have an obligation to disclose exculpatory
15 evidence?

16 A. I couldn't recite the policy to you. I know
17 we go by the law.

18 Q. So if there is a written policy -- and I've
19 requested that from your counsel -- that would have
20 been provided; correct?

21 A. What now?

22 Q. If your -- if there is a written policy --

23 A. Uh-huh. Uh-huh.

24 Q. -- concerning the disclosure of Brady
25 material --

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

45

1 going on since well before I took office. Two or
2 three, four years before I ever assumed office. So
3 while I was there, they were occurring, and so, yes, I
4 knew about them.

5 Q. Okay. How did you hear about these incidents
6 that occurred prior to becoming Sheriff?

7 A. Prior to becoming -- like I said, I was
8 working there when some of them were going on and
9 heard the discussions around. Members of the public.
10 Everywhere I went, especially after I was elected, it
11 was a topic of conversation. Members of the public.

12 Q. What members of the public do you recall
13 discussing the case?

14 A. It would be easier to say which ones didn't.
15 Just mostly victims, but just other people that
16 weren't victims, but just had -- had an idea who was
17 doing it and what we needed to do.

18 Q. Who were the victims that you spoke to?

19 A. Oh, there were some -- I don't know who. You
20 said while ago there were 60-some-odd victims or
21 something. Most of them. I don't know.

22 Q. Did these victims reach out to you
23 personally?

24 A. Yes.

25 Q. Okay. How would they contact you?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

46

1 A. well, this occurred five miles from my house.
2 I mean, this is where I go to church, and hardware
3 store and restaurant and everywhere else. Grocery
4 store. So just bumping into people mainly.

5 Q. who were the people that you would bump into
6 and have these conversations?

7 A. Most of the -- just various members of the
8 public. You know, I don't remember over nine years
9 who or where I saw them, but.

10 Q. Did you have any discussion with members of
11 the public during your campaign while you were running
12 for Sheriff?

13 MR. LANGLEY: About these incidents?

14 Q. (By Ms. Buckle) Yes.

15 A. I'm -- yeah. I think some people probably
16 asked me about it, yeah.

17 Q. Okay. Either during the election or after --
18 or after the election, did you -- do you recall making
19 any promises or assurances to the victims of the
20 public?

21 A. Yeah. I said we're going to find who's doing
22 this and arrest him.

23 Q. When you took office on July 1st, 2012, what
24 was your understanding of the status of the
25 investigation?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

50

1 Q. Okay. Was this considered a high-profile
2 case?

3 A. Yes.

4 Q. Why was it high profile?

5 A. As I mentioned earlier, it was 60-some-odd
6 members -- 60-some-odd victims. It was in my
7 backyard, where I travel every day. And everybody I
8 came across almost on a daily basis, it was on their
9 mind, you know. And so, yes. I don't remember a
10 crime with 60 victims in my whole years there.

11 Q. Did you request to be updated concerning this
12 investigation?

13 A. Yes. There was not a daily or weekly or any
14 set meetings to discuss it, but, yes, that's an
15 accurate statement. I had instructed them to keep me
16 in the loop, I think, probably would be the term I'd
17 use.

18 Q. How did you receive updates?

19 A. They would tell me about it. Conversations.

20 Q. Was this in person?

21 A. Uh-huh.

22 Q. Did you ever receive emails about the case?

23 A. No.

24 Q. Did you ever have any -- exchange any text
25 messages with detectives about the case?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

52

1 look through it to see if it looks like -- if you
2 recall ever reviewing or reading this report. It was
3 prepared by Lieutenant Bletz.

4 A. I may have seen it. I don't know.

5 Q. Okay.

6 A. It's -- looks, obviously, like one of our
7 reports, but I don't recall particularly reviewing
8 or -- no, ma'am.

9 Q. Okay. Sheriff, with respect to the 60-plus
10 incidents that occurred, the spikings and arsons and
11 vandalisms --

12 A. Uh-huh.

13 Q. -- did you ever formally interview any
14 witnesses?

15 A. No.

16 Q. Okay. Did you ever visit any scenes of the
17 crimes?

18 A. Strictly dealing with Phillips; correct? No.

19 Q. Did you ever write any reports?

20 A. No.

21 Q. In October of 2012, there was an incident
22 where an incendiary device was found at or near a deer
23 stand that belonged to Gary Wilson. Do you recall if
24 you ever spoke to Gary Wilson about his deer stand or
25 deer camp being burned?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

72

1 Q. And what else?

2 A. That's it. That's all I can remember.

3 Q. Okay. Do you recall if you were ever advised
4 that the Phillips had placed that horse medication in
5 the trash?

6 A. I did hear that. I did.

7 Q. Do you recall hearing that from your
8 detectives?

9 A. It was -- yes.

10 Q. Okay. Prior to the citation being issued?

11 A. Yes.

12 Q. Did you ever have a meeting with Sonny
13 Bickham to discuss these vandalisms?

14 A. No.

15 Q. Did you ever have a meeting with Sonny
16 Bickham to discuss Todd Phillips?

17 A. No.

18 Q. Okay. What -- Mr. Sonny Bickham and
19 Mr. Breck Bickham have testified that they attended a
20 meeting with you at the Sheriff's Office. Do you
21 recall that meeting?

22 A. They did come down. I'm certain they did. I
23 don't remember in particular -- I mean, that was on
24 their mind, but I don't remember what we talked about
25 as far as specifics or particulars or whatever. I

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential

07/25/2019

73

1 think -- I don't know if that was before or after we
2 had written a citation. What year was that? Or -- I
3 don't -- they did come down, and were concerned, the
4 safety and everything going on. That did happen.
5 Yes, it did.

6 Q. Okay.

7 A. Sure did.

8 Q. They were concerned about their safety?

9 A. Just the Burn -- yeah. Everybody's safety.

10 Q. Where did this meeting take place?

11 A. It was at the courthouse. Conference room.

12 Q. Is there a conference room?

13 A. Yes.

14 Q. Who else was present?

15 A. I don't know, ma'am.

16 Q. Was this a meeting that you scheduled?

17 A. No. No.

18 Q. Do you recall if you or members of the
19 criminal investigations team discussed the evidence
20 against Mr. Phillips?

21 A. I don't even know who was there besides the
22 Bickhams.

23 MS. BUCKLE: Okay. If we can take a quick
24 break. I'm told we need to change the video.

25 VIDEOGRAPHER: All right. The time is

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

75

1 Do you recall that?

2 A. No. I remember one being done, talked about,
3 but I don't recall issuing the -- it was my idea to do
4 it.

5 Q. Okay. Do you recall what the results of that
6 voice stress analysis were?

7 A. No.

8 Q. Okay. Do you know why a voice stress
9 analysis was not done for Todd Phillips?

10 A. No.

11 Q. Okay.

12 (Ms. Parks enters the room.)

13 Q. (By Ms. Buckle) Were you ever advised that
14 Todd Phillips and his counsel, Marty Stroud, had
15 requested a meeting with you personally to discuss the
16 investigation?

17 A. No.

18 Q. If that request was made to a member of your
19 criminal investigations team should that message have
20 been submitted to you?

21 A. I would hope so.

22 Q. During the investigation of the spikings and
23 the arsons, did you personally consult with District
24 Attorney Schuyler Marvin?

25 A. Yes. Over the course of many years, we

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

82

1 or -- I don't know. I don't know who I heard it from.

2 Q. Okay. And you said you were not involved
3 with the decision to charge Mr. Phillips with a felony
4 offense.

5 A. Correct.

6 Q. Do you know who made the decision?

7 A. I -- no.

8 Q. Did anyone from the District Attorney's
9 office consult with you prior to charging him with a
10 felony?

11 A. With me? No.

12 Q. How long have you known Gary Wilson?

13 A. Too long. 30 -- 30 years.

14 Q. How do you know him?

15 A. He's just a resident of the area.

16 Q. Did you go to school with him?

17 A. No, I did not.

18 Q. Have you ever attended church with him?

19 A. No.

20 Q. Has he done -- ever done any work for you?

21 A. His son did. His son did. Uh-huh.

22 Q. What did his son do?

23 A. He was a trapper, and he trapped some coyotes
24 down on my place.

25 Q. When was that?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

87

1 A. I don't.

2 Q. Okay. Sheriff, we know through the course of
3 discovery in this case that there was a task force
4 created in January 2017.

5 A. Uh-huh. That's not the correct date.

6 Q. I'm going to talk about two task forces.

7 A. Okay.

8 Q. And correct me on the date if it's wrong, but
9 my understanding is that there was a task force
10 created after, I guess what we can refer to as, the
11 grave was located.

12 A. Uh-huh.

13 Q. When was that task force formed?

14 A. That was when Chief Huddleston was put in
15 charge. That was in October of '17.

16 Q. Was there a task force created prior to that
17 time?

18 A. There was.

19 Q. And what was that task force created for?

20 A. We were continuing to have crimes being
21 committed.

22 Q. Then this is after Mr. Phillips had been --

23 A. That's true.

24 Q. -- issued a citation; correct?

25 A. That's true.

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

88

1 Q. Did you -- did you instruct that this task
2 force be formed?

3 A. I was involved and aware and --

4 MR. LANGLEY: Just answer the question.

5 A. Yes.

6 Q. (By Ms. Buckle) Did you select the members
7 of the task force?

8 A. Along with Chief Owens, I believe we did.

9 Q. And do you recall who was selected?

10 A. I know Shannon Mack was one, and I don't
11 recall who else.

12 Q. Okay. Do you recall if Lieutenant Bletz was
13 part of this task force?

14 A. No, I don't.

15 Q. No, you don't recall?

16 A. I don't recall.

17 Q. Where did this task force operate?

18 A. Viking Drive.

19 Q. All right. What instructions were they
20 given?

21 A. To find out why these were still happening
22 and who's doing it.

23 Q. At this point, when this task force was
24 formed, was there some doubt that Todd Phillips was
25 responsible?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

89

1 A. Didn't know who was responsible.

2 Q. If you believed Todd Phillips was
3 responsible, would there have been a reason to form
4 this task force?

5 A. Yeah. If he's committing more crimes we can
6 charge him with more -- more charges. More crimes --

7 Q. Okay.

8 A. -- that he's doing.

9 Q. Your testimony is you didn't know who was
10 committing them; correct?

11 A. No.

12 Q. And you told -- the instructions to the task
13 force members were to find out why these are still
14 going on and who's committing them?

15 A. Yes, ma'am.

16 Q. Did they find out why these crimes were still
17 going on and who was committing them?

18 A. No.

19 Q. Why not?

20 A. It was concluded that -- we were reassured
21 that the District Attorney's office, that there was
22 ample, solid case, and they didn't need any more
23 evidence. They had a good case.

24 MR. LANGLEY: Object to any communication the
25 witness discloses communication from the District

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

92

1 A. I don't recall. Not that I remember. I
2 don't remember. I don't recall.

3 Q. If other members of the Sheriff's office have
4 testified that those instructions came from you, do
5 you have any reason to dispute that?

6 A. I was aware of it -- but I don't recall who
7 said -- say your statement again?

8 Q. If other members of the Bossier Parish
9 Sheriff's Office have testified that the instructions
10 to discontinue the investigation of the task force,
11 that instruction came from you --

12 A. It's possible.

13 Q. -- do you have any reason to dispute that?

14 A. No, I don't.

15 Q. When was the second task force created?

16 A. It was October of '17.

17 Q. Okay. Were there only two task forces?

18 A. Correct.

19 Q. All right. Why was the October 2017 task
20 force created?

21 A. Crimes were still being committed, even
22 wilder and more bizarre. Letters, a grave that one of
23 my deputies very possibly likely would have died had
24 he stepped in it. Things were just ratcheting up.

25 (Mr. Stroud enters the room.)

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

93

1 Q. (By Ms. Buckle) Sheriff, if the grave was
2 found in January of 2017, does that refresh your
3 memory at all as to the -- why that first task force
4 was created?

5 A. January of '17 is what you're saying? I'll
6 have to stipulate that. I don't recall when it was
7 found. I know it was one of the reasons that we
8 formed it in October.

9 Q. Could it have also been part of the
10 investigation from the first task force?

11 MR. LANGLEY: I don't understand the
12 question.

13 A. I don't understand.

14 Q. (By Ms. Buckle) Other detectives have
15 testified in this proceeding that the first task force
16 was created in January 2017 after the grave was found.

17 A. No. The first task force in January --
18 well -- I thought it was earlier than that, but
19 it's -- that's possible. It's possible. That's
20 possible. Yes, ma'am. It is possible. Yes. It
21 surely is. I'm absolute on the date of the second one
22 was October '17. But that's possible. It's possible.
23 Yes. Correct.

24 Q. Okay. Well, let me just go back just
25 briefly. Was it believed that the grave was related

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

94

1 to the other spikings and arsons and vandalisms?

2 A. It was similar in nature to some of the
3 others, yes. Yes.

4 Q. Okay. Do you know if the task force
5 identified any suspects?

6 MR. LANGLEY: The second task force, Counsel?

7 MS. BUCKLE: First.

8 A. The first? I think I said no. No.

9 Q. (By Ms. Buckle) Do you know if Todd Phillips
10 was considered not to be a suspect of the grave
11 incident?

12 A. Everybody was a suspect.

13 Q. Do you know if any -- well, do you know if
14 any member -- strike that.

15 In October 2017 the second task force was
16 created. And you were saying events were still
17 occurring?

18 A. Correct.

19 Q. What was the purpose of this task force?

20 A. Find out who was doing it.

21 Q. Okay. What events were occurring that led to
22 this task force?

23 A. I just remember that the letters were getting
24 more bizarre and wilder and somewhat threatening in
25 nature. Letters were sent out all around the town of

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

97

1 A. I don't know about it.

2 Q. Okay. So this is --

3 A. I don't remember that one.

4 Q. This is 17-2918, and you don't remember that
5 one?

6 A. No, ma'am, I don't.

7 Q. Okay. But the first two you do recall?

8 A. Are very familiar. Yes, ma'am.

9 Q. Those were some of the letters that were
10 being sent out prior to the October 2017 investigation
11 being formed?

12 A. That's correct.

13 Q. And these letters, Sheriff, did you consider
14 them to be personally directed toward you or your
15 family members in any way?

16 A. Yes. Specifically my daughter. Someone that
17 that's infatuated or concerned and included her name
18 in those types of letters certainly made me concerned
19 for her personal safety. Yes, ma'am, it did.

20 Q. Did you believe these letters to be related
21 to the previous acts of spikings and arsons?

22 A. Yes.

23 Q. Did you believe Todd Phillips was sending
24 these letters?

25 A. I didn't know who was sending them.

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

99

1 A. Find out who's doing this.

2 Q. Okay. Did those instructions come from you?

3 A. They certainly did.

4 Q. Where were they working from?

5 A. They worked out of the old Plain Dealing
6 Academy school that the Sheriff's Office owns.

7 Q. Why were they working from there?

8 A. Because of the sensitivity, all the victims
9 right there in the coffee shops and the hamburger
10 joints and proximity, we moved them up there for
11 privacy.

12 Q. Were you also trying to keep this
13 investigation confidential from other members of the
14 Sheriff's Office?

15 A. Trying to keep it confidential from
16 everybody.

17 Q. Did you have any discussions with members of
18 this task force about whether Todd Phillips was
19 responsible for any of the criminal acts?

20 A. We talked about any and everybody that could
21 be responsible. I'm sure he was probably named. I
22 don't specifically have any conversations about him in
23 particular, but he was certainly on the list, yes.

24 Q. Do you recall when you were first informed
25 that Gary Wilson was a suspect?

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

110

1 A. Uh-huh.

2 Q. -- did you visit in his house concerning the
3 investigation of a crime against Gary Wilson?

4 A. Say that again.

5 MR. LANGLEY: Against?

6 Q. (By Mr. Hays) Against Gary Wilson,

7 MR. LANGLEY: A crime against Gary Wilson?

8 A. Against him?

9 Q. (By Mr. Hays) Against -- when Gary Wilson's
10 house was vandalized in November of 2015, did you go
11 to his house?

12 A. I did.

13 Q. Okay. How did you go there?

14 A. He called -- his uncle called me.

15 Q. Who -- that would be Jimmy Hope?

16 A. Yes, sir.

17 Q. Okay. And what -- what transpired then?

18 A. He told me he was at Gary's -- he was at
19 Gary's; Gary was upset. His house had been
20 burglarized, and Gary wanted me to come up there.

21 Q. And did you do so?

22 A. I did.

23 Q. Did you -- were you accompanied by any other
24 deputies?

25 A. I was the only one there for a short time and

SHERIFF JULIAN WHITTINGTON - CONFIDENTIAL

Confidential
07/25/2019

111

1 then I notified our detectives in crime scene to
2 respond.

3 Q. And they came to investigate the crime, the
4 vandalism, the burglary at his house?

5 A. Correct.

6 Q. All right. Did you have any discussions with
7 Mr. Wilson?

8 A. Yes, sir. We stood there and talked for an
9 hour or two or so.

10 Q. Did you have -- what did you discuss?

11 A. I mean, he was upset about his home being
12 burglarized. And I don't remember what we talked
13 about.

14 Q. Do you recall having any discussions
15 concerning the signs that had been placed at Todd --
16 near Todd Phillips' home?

17 A. No, sir, I don't.

18 Q. Don't remember that. Okay. Now, in your
19 education and training as a law enforcement officer,
20 I'm assuming that you have been trained to
21 determine -- in committing -- to finding out a
22 suspect, would motive be one of the elements of the
23 crime that would lead you to the arrest of someone?

24 A. Yes.

25 Q. I mean, why someone may have done it.